

MARCELLUS MCRAE, SBN 140308  
mmcrae@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, CA 90071-3197  
Telephone: 213.229.7000  
Facsimile: 213.229.7520

ASHLEY E. JOHNSON, admitted *pro hac vice*  
ajohnson@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
2001 Ross Avenue  
Dallas, TX 75201  
Telephone: 214.698.3100  
Facsimile: 214.571.2949

Attorneys for Defendant AT&T MOBILITY LLC

CHRISTOPHER GRIVAKES  
cg@agzlaw.com  
DAMION ROBINSON  
dr@agzlaw.com  
AFFELD GRIVAKES LLP  
2049 Century Park East, Suite 2460  
Los Angeles, CA 90067  
Telephone: 310.979.8700  
Facsimile: 310.979.8701

Attorneys for Plaintiff ROBERT ROSS

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

ROBERT ROSS,

Plaintiff,

v.

AT&T MOBILITY LLC, ONE TOUCH  
DIRECT, LLC, and, ONE TOUCH DIRECT-  
SAN ANTONIO, LLC,

Defendant.

KEVIN T. COLLINS (SBN: 185427)  
kcollins@buchalter.com  
ALISSA R. PLEAU-FULLER (SBN: 258907)  
apleaufuller@buchalter.com  
MIKHAIL PARNES (SBN: 300922)  
mparnes@buchalter.com  
BUCHALTER  
500 Capitol Mall, Suite 1900  
Sacramento, CA 95814  
Telephone: 916.945.5170

Attorneys for Defendants ONE TOUCH  
DIRECT, LLC, and ONETOUCH DIRECT-  
SAN ANTONIO LLC

CASE NO. 4:19-CV-06669 (JST)

**JOINT STIPULATION TO REQUEST  
ORDER EXTENDING SCHEDULING  
ORDER DEADLINES**

Fact discovery cutoff – April 8, 2022  
Expert disclosures – April 22, 2022  
Expert rebuttal – May 27, 2022  
Dispositive motions – July 15, 2022  
Pretrial conference statement – October 28, 2022  
Pretrial conference – November 4, 2022  
Trial – December 5, 2022

Pursuant to Local Rule 6-2, Plaintiff Robert Ross (“Ross”), Defendant AT&T Mobility LLC (“AT&T”), and Defendants One Touch Direct, LLC and OneTouch Direct – San Antonio LLC (collectively, “One Touch”) (all parties collectively, the “Parties”), by and through their respective counsel of record, stipulate and agree as follows:

WHEREAS, this Court issued an initial Scheduling Order on March 19, 2020 (Dkt. 42);

WHEREAS, this Court issued a Revised Scheduling Order on April 21, 2021 (Dkt. 95);

WHEREAS, the Revised Scheduling Order set the following case deadlines:

Fact discovery cutoff – December 23, 2021  
Expert disclosures – January 6, 2022  
Expert rebuttal – February 10, 2022  
Dispositive motions – March 1, 2022  
Pretrial conference statement – July 15, 2022  
Pretrial conference – July 22, 2022  
Trial – August 15, 2022

WHEREAS, on August 26, 2021, Magistrate Judge Ryu entered a discovery order in this action (Dkt. 118.);

WHEREAS, the Parties have agreed to postpone the settlement conference previously scheduled for September 30, 2021 to November 2021, because Plaintiff’s counsel has indicated that he believes the settlement conference would be more productive if he is allowed additional time to confer with his client regarding Magistrate Judge Ryu’s order, as well as ongoing developments in other cases;

WHEREAS, the Parties agree that the current scheduling order should be extended as follows in light of the postponement to the settlement conference and to preserve the resources of the Parties and the Court:

Fact discovery cutoff – April 8, 2022  
Expert disclosures – April 22, 2022  
Expert rebuttal – May 27, 2022  
Dispositive motions – July 15, 2022  
Pretrial conference statement – October 28, 2022  
Pretrial conference – November 4, 2022  
Trial – December 5, 2022

WHEREAS, the parties have previously extended the schedule entered by the Court on one occasion;

WHEREAS, the stipulation will not affect any deadlines fixed by the Court other than as set forth herein;

IT IS HEREBY STIPULATED AND AGREED, by and between Ross, One Touch, and AT&T through their respective counsel of record, as follows:

1. The deadlines contained in the Revised Scheduling Order (Dkt. 95) should be further revised as follows:

Fact discovery cutoff – April 8, 2022  
Expert disclosures – April 22, 2022  
Expert rebuttal – May 27, 2022  
Dispositive motions – July 15, 2022  
Pretrial conference statement – October 28, 2022  
Pretrial conference – November 4, 2022  
Trial – December 5, 2022

Respectfully submitted,

Dated: September 29, 2021

MARCELLUS MCRAE  
ASHLEY E. JOHNSON  
GIBSON, DUNN & CRUTCHER LLP

By: /s/ Ashley E. Johnson  
Marcellus McRae  
Ashley E. Johnson

Attorneys for Defendant AT&T MOBILITY LLC

DATED: September 29, 2021

CHRISTOPHER GRIVAKES  
AFFELD GRIVAKES LLP

By: /s/ Christopher Grivakes  
Christopher Grivakes

Attorneys for Plaintiff ROBERT ROSS

DATED: September 29, 2021

KEVIN T. COLLINS  
ALISSA R. PLEAU-FULLER  
BUCHALTER

By: /s/ Alissa R. Pleau-Fuller  
Alissa R. Pleau-Fuller

Attorneys for Defendants ONE TOUCH DIRECT, LLC,  
and ONETOUCH DIRECT- SAN ANTONIO LLC

1 Local Rule 5-1(i) attestation:

2 Pursuant to Local Rule 5-1(i), I, Ashley E. Johnson, attest that concurrence in the filing of this  
3 document was obtained from the other signatories to this document.  
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